

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

ROBERT STOUD,	:	
	:	
Plaintiff	:	CIVIL ACTION - LAW
	:	
v.	:	
	:	
SUSQUEHANNA COUNTY,	:	NO. 3:17-CV-2183-MEM
	:	
Defendant	:	

MOTION FOR EXTENSION OF TIME TO FILE BRIEF IN SUPPORT OF
MOTION FOR SUMMARY JUDGMENT

Defendant, Susquehanna County, through its attorneys, Kreder Brooks Hailstone LLP, hereby requests the Court to extend the deadline to file Brief in Support of Motion for Summary Judgment, and cite the following reasons, therefore:

1. Defendant filed a Motion for Summary in the above action on November 29, 2018.
2. The Brief in Support is due on December 13, 2018.

3. Subsequently to the filing, Plaintiff and Defendant have determined that mediation may resolve this action.
4. Defendants request that the deadline for filing of Dispositive Motions be extended to December 28, 2018 to allow Plaintiff and Defendant to discuss mediation.
5. Plaintiff concurs in this request.
6. The requested extension will not unreasonably delay trial.

WHEREFORE, it is respectfully requested that the Court extend the deadline for the filing of Dispositive Motions to December 28, 2018.

KREDER BROOKS HAILSTONE LLP

By /s/A. James Hailstone

A. James Hailstone

Attorney for Defendant

CERTIFICATE OF CONCURRENCE

I, A. James Hailstone, hereby certify that I contacted Plaintiffs' counsel in accordance with the Local Rules to determine whether he would concur in the attached Motion. Plaintiffs' counsel concurs with the attached Motion.

KREDER BROOKS HAILSTONE LLP

220 Penn Avenue, Ste 200
Scranton, PA 18503

/s/A. James Hailstone

A. James Hailstone
Attorney I.D. #80055
Attorneys for Defendant

CERTIFICATE OF SERVICE

AND NOW, this 12th day of December, 2018, A. James Hailstone, a member of the firm of Kreder Brooks Hailstone LLP, electronically filed the foregoing Motion with the Clerk of the United States District Court for the Middle District of Pennsylvania using the CM/ECF system which sent notification of such filing to the following Filing Users at the following e-mail address(es):

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